

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Request of Lockheed Martin Corporation)	CC Docket No. 92-237
and Warburg, Pincus & Co. for Review)	
of the Transfer of the Lockheed Martin)	
Communications Industry Services)	
Business;)	
)	
Numbering Resource Optimization)	CC Docket 99-200

COMMENTS OF SBC COMMUNICATIONS INC.

On June 13, 2002, the Wireline Competition Bureau (Bureau) released a *Public Notice* seeking comment “on the technical requirements that will be used in preparing the solicitation for the North American Numbering Plan Administrator’s (NANPA) next term of administration.”¹ The Bureau expressly asked that commenters “address whether the technical requirements are sufficiently detailed, comprehensive, and clear, and whether they adequately describe the duties and scope of the North American Numbering Plan Administrator’s responsibilities.”² On behalf of its common carrier affiliates, as well as on its own behalf, SBC Communications Inc. (SBC) files these comments.

Section 2: General Requirements

Under this heading, SBC notes the following:

- In section 2.1.2, it would appear appropriate for the NANPA to update its processes to reflect changes to Industry Numbering Committee (INC) guidelines, as well (*see* section 4.1).

¹ *Public Notice: The Wireline Competition Bureau Seeks Comments on the North American Numbering Plan Administrator Technical Requirements*, DA 02-1412 (rel. June 13, 2002) (*Notice*).

² *Id.*, p. 2.

- In section 2.10, can you clarify with whom NANPA will share “in real time the cost implications and administrative impact upon the NANPA duties and responsibilities”?
- In section 2.10, the Technical Requirements Document (TRD) states that “[w]ithin seven days of a change, NANPA shall provide its interpretation of the change, its impact upon service, the date the new change is effective, what steps in current procedures shall change and when any new forms or procedures shall be required.” SBC would like to know what will trigger this seven-day process. Also, SBC proposes that, for changes based on INC issues, the seven-day process begin with Initial Closure. Any change-management process should lend itself to a permissive — rather than a restrictive — interaction between affected parties.
- In sections 2.2.2, 2.17.7, and 2.17.8 there appears to be conflicting direction regarding attendance versus maintaining knowledge of Study Groups A and 2.

Section 4: Central Office Code Administration

Under this section, SBC notes the following:

- In section 4.1, the TRD states that “[t]raining shall be completed within five business days of the date the change to the guidelines becomes effective.” Could you clarify whether the training takes place within five days before or within five days after the effective date of the change?
- In section 4.2.1, the list of CO Code (NXX) Assignment Guidelines (COCAG) forms appears to be incorrect — there is no Part 5 and the MTE form is not mentioned. It might be easier to simply state “all forms and appendices associated with INC guidelines.”
- In section 4.2.2, the TRD reads: NANPA shall provide a response (i.e., assign, seek additional information or deny assignment) to CO Code applicants within the time frame specified in the CO Code (NXX) Assignment Guidelines and the

application shall be considered “Assigned.” This does not appear to comport with the Part 3 form of the COCAG. Is the intent to re-design the Part 3 form? Also, if the responses include a denial of an assignment, how could a denial “be considered ‘Assigned’”?

- In section 4.2.2, the TRD states that “[a]pplications denied as a result of rationing plans shall be held for subsequent monthly lotteries or assignments; . . .” This appears to conflict with current INC guidelines that present this as an option for the industry to decide on a local basis.
- In section 4.2.2, the TRD states that the NANPA shall also “consult.” Consult with whom?
- In section 4.2.6, NANPA “shall monitor CO Code growth and projected exhaust.” With regard to projecting/reporting exhaust of NPAs where rationing is taking place, NANPA’s responsibilities should be clarified. (*See also* sections 6.3.1.3, 8.0, 8.1, 8.2.2, and 8.2.3.)

Section 5: NPA Relief Planning

Under this section, SBC notes the following:

- To be consistent with INC guidelines, the NANPA should not just “schedule” the first implementation meeting, but should also *facilitate* that meeting. (*See* section 5.1.12.)
- In section 5.1.15, the TRD describes how the NANPA will handle area code relief in the absence of industry consensus. This section is not entirely clear because it is merging concepts in jeopardy code administration (TRD, § 4) with duties for implementing NPA relief plans.

Section 7: Automated Support System

Under this section, SBC notes the following:

- In section 7.1.1 it is not clear whether every potential bidder, including the incumbent, must define and provide a new NANP administration system or whether the current system will be made available to the new NANPA.
- In section 7.1.3, the TRD reads: “[t]he NANP [automated support] system shall be expandable and flexible so that it can easily expand its capacity and number of clients.” Does this flexibility include the use of data fields for users (e.g. NANPA and SP) to add additional explanations or remarks?
- In section 7.18.6, the TRD reads: “These reports shall also be mailed and accepted by the NANPA in paper form.” This seems to be a new requirement on SPs, not the NANPA.

General Observation

SBC notes that the List of References at the end of the TRD contains INC guidelines with document dates. Assuming that the Commission is establishing a point of reference upon which scope changes are based, SBC recommends that document dates be updated at the time this TRD is sent out for bid.

The TRD attempts to incorporate too much detail from INC guidelines. SBC is concerned that this detail, memorialized in the TRD, could be used to contradict information that is later updated by the INC. This would present NANPA with conflicting points of reference. To prevent a possible conflict, the better approach may be to simply incorporate by reference all INC guidelines. A simple sentence could serve as an overall statement in the TRD to cover this concern: “NANPA shall comply with the currently published versions of all INC guidelines.” This takes the burden off of the Commission in choosing which parts of guidelines should be highlighted in the TRD.

Respectfully submitted,
SBC COMMUNICATIONS INC.

/s/ William A. Brown

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